

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

UNITED STATES OF AMERICA and the
STATES of GEORGIA, LOUISIANA,
TENNESSEE, and VIRGINIA *ex rel.*
GREGORY FOLSE,

Plaintiffs,

v.

CARE SERVICES MANAGEMENT LLC,
MARQUIS HEALTH SYSTEMS LLC,
MARQUIS MOBILE DENTAL SERVICES
LLC, FLEUR DE LIS MOBILE DENTAL
LLC, GEORGIA MOBILE DENTAL LLC,
PREMIERE MOBILE DENTISTRY OF VA
LLC, and DOES 1-50,

Defendants.

Civil Action No. 3:17-cv-01478
JUDGE TRAUGER

**RELATOR'S NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE OF
DEFENDANTS GEORGIA MOBILE DENTAL LLC AND PREMIERE MOBILE
DENTISTRY OF VA LLC ONLY**

Pursuant to Federal Rule of Civil Procedure 41(a) and 31 U.S.C. 3730(b)(1), *qui tam* Plaintiff-Relator Gregory Folse files this Notice of Voluntary Dismissal Without Prejudice of Defendants Georgia Mobile Dental LLC and Premiere Mobile Dentistry of VA LLC Only.

On November 22, 2017, Relator filed an original Complaint in this matter pleading claims under both Federal and State False Claims Acts (Georgia, Louisiana, and Tennessee) [Dkt. 1]. On March 3, 2018 the United States filed its Notice of Election to Decline to Intervene, but the Plaintiff States continued to investigate [Dkt. 15]. On December 11, 2018, Relator filed

an Amended Complaint adding additional Defendants (Premiere) and State False Claims Act claims (Virginia) [Dkt. 22]. On November 25, 2020, in a Notice filed by the State of Tennessee, the States of Tennessee and Louisiana Elected to Intervene in Part, and the States of Georgia and Virginia Elected to Decline to Intervene [Dkt. 40].

As of this time, both the United States and all of the Plaintiff States have declined to intervene against two of the Defendants named in Relator's Amended Complaint—Defendants Georgia Mobile Dental LLC and Premiere Mobile Dentistry of VA LLC. Relator voluntarily dismisses, without prejudice, these two Defendants only.

Relator has conferred with counsel for the United States and for the States of Tennessee, Louisiana, Georgia, and Virginia, and each has represented that they consent to dismissal, so long as dismissal is without prejudice to the United States or to the Plaintiff States.

As of this filing, none of the Defendants in this action have served an answer or motion for summary judgment and, therefore, this Notice is filed as a matter of right under Rule 41(a)(1)(A)(i).

This notice is not intended to and does not affect or dismiss any other Defendants or claims.

A proposed Order is attached for the Court's convenience.

Dated: _____

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